

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION**

**TERESA SABBIE, Individually, as
Personal Representative of the ESTATE
OF MICHAEL SABBIE, and as parent and
Natural guardian of her minor children,
T.S., T.S., and M.S.; SHANYKE NORTON,
as parent and natural guardian of her
minor child, M.S.; KIMBERLY WILLIAMS;
MARCUS SABBIE; and CHARLISA CRUMP,
*Plaintiffs***

v.

**SOUTHWESTERN CORRECTIONAL, LLC
d/b/a LASALLE CORRECTIONS, LLC and
LASALLE SOUTHWEST CORRECTIONS;
LASALLE MANAGEMENT COMPANY,
LLC; BOWIE COUNTY, TEXAS; the CITY
of TEXARKANA, ARKANSAS; TIFFANY
VENABLE, LVN, individually; M. FLINT,
LVN, individually; GREGORY MONTOYA,
M.D., individually; CLINT BROWN,
individually; NATHANIEL JOHNSON,
individually; BRIAN JONES, individually;
ROBERT DERRICK, individually; DANIEL
HOPKINS, individually; STUART BOOZER,
individually; ANDREW LOMAX,
individually; SHAWN PALMER,
individually; SIMONE NASH, individually;
and JOHN and JANE DOES 1-10,
*Defendants***

No. 5:17-CV-113

DEFENDANTS' NOTIFICATION

Notice is hereby given by Defendants Southwestern Correctional, L.L.C. d/b/a LaSalle Corrections, L.L.C. and LaSalle Southwest Corrections, pursuant to Federal Rules of Civil Procedure 33 and 34, that Plaintiffs have been served with the following on this 25th day of June, 2018:

1. *Defendants Southwestern Correctional, L.L.C. d/b/a LaSalle Corrections, L.L.C., LaSalle Southwest Corrections, and LaSalle Management Company, L.L.C.'s First Supplemental Answers and Responses to Plaintiffs' First Discovery Requests, and*
2. *Defendants Southwestern Correctional, L.L.C. d/b/a LaSalle Corrections, L.L.C., LaSalle Southwest Corrections, and LaSalle Management Company, L.L.C.'s First Supplemental Answers and Responses to Plaintiffs' Second Discovery Requests.*

Respectfully submitted,



Paul Miller

Texas State Bar No.: 14056050
Troy Hornsby
Texas State Bar No.: 00790919

MILLER, JAMES, MILLER & HORNSBY, L.L.P.
1725 Galleria Oaks Drive
Texarkana, Texas 75503
903.794.2711; f. 903.792.1276
paulmiller@cableone.net
troy.hornsby@gmail.com

Attorneys for Defendants Southwestern Correctional, LLC d/b/a LaSalle Corrections, LLC and LaSalle Southwest Corrections; LaSalle Management Company, LLC; Bowie County, Texas; Tiffany Venable, LVN, individually; M. Flint, LVN, individually; Clint Brown, individually; Nathaniel Johnson, individually; Brian Jones, individually; Robert Derrick, individually; Daniel Hopkins, individually; Stuart Boozer, Individually; Andrew Lomax, individually; Shawn Palmer, individually; Simone Nash, individually

CERTIFICATE OF SERVICE

The undersigned certifies that on the 25th day of June, 2018, this document was filed with the Clerk of the U.S. District Court for the Eastern District of Texas and served to counsel of record via CM/ECF.

Edwin Budge
ed@budgeandheipt.com
Erik Heipt
erik@budgeandheipt.com
BUDGE & HEIPT, P.L.L.C.
705 Second Ave., Ste. 910
Seattle, WA 98122

Bruce Flint
bruceflint@aol.com
Matt Soyars
msoyars@bruceflint.com
FLINT & SOYARS, P.C.
2821 Richmond Rd.
Texarkana, TX 75503



Paul Miller